

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

New York Power Authority)	
Consolidated Edison Company)	Docket No. ER12-1624-000
of New York, Inc.)	
)	

**MOTION TO INTERVENE AND ANSWER IN SUPPORT BY
THE NEW YORK INDEPENDENT SYSTEM OPERATOR, INC.**

In accordance with Rules 212, and 213 of the Commission’s Rules of Practice and Procedure,¹ the New York Independent System Operator, Inc. (“NYISO”) respectfully moves to intervene, and answer in the above-captioned proceeding.²

I. BACKGROUND

On April 26, 2012, New York Power Authority (“NYPA”) and Consolidated Edison Company of New York, Inc. (“Con Edison”), collectively “the Parties”, filed a Transmission Facility Interconnection Agreement (“Interconnection Agreement”) requesting the Federal Energy Regulatory Commission (“FERC” or “the Commission”) accept the Interconnection Agreement effective May 1, 2012. In the Interconnection Agreement, the Parties proposed a new transmission tie to connect the Con Edison Astoria East Substation to the NYPA Astoria Annex Substation. This was proposed by Con Edison as a solution for the local reliability

¹ 18 C.F.R. §§ 385.212, and 385.213 (2012).

² Filing of an Executed Interconnection Agreement Between the New York Power Authority and Consolidated Edison Company of New York, Inc., Docket No. ER12-1624-000 (April 26, 2012)(“Interconnection Agreement Filing”).

deficiency that could result in the event of the mothballing of the Astoria No. 2 generator and the concurrent unavailability of Astoria No. 4 generator. The Parties sought a waiver of the 60-day notice period, to accommodate the requested effective date, so that the identified potential local reliability deficiency could be remedied prior to the commencement of the Summer Capability Period. The Commission issued a notice on April 26, 2012 setting a Comments due date of May 17, 2012.

On May 2, 2012 Con Edison filed a motion for a shortened comment period and a request for expedited treatment (“Motion”). In its Motion Con Edison requested the comment period be shortened to May 7, 2012 and requested Commission action on the Interconnection Agreement by May 9, 2012.

II. COMMUNICATIONS

Copies of correspondence concerning this filing should be served on:

Robert E. Fernandez, General Counsel
Raymond Stalter, Director of Regulatory Affairs
*Karen Georgenson Gach, Deputy General Counsel
*Kristin A. Bluvás, Attorney
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
Tel: (518) 356-8540
Fax: (518) 356-4702
rfernandez@nyiso.com
rstalter@nyiso.com
kgach@nyiso.com
kbluvás@nyiso.com

* Persons designated for service.

III. MOTION TO INTERVENE

The NYISO is a not-for-profit corporation responsible for providing open-access transmission service, administering open and competitive wholesale markets, and bringing together buyers and sellers of electricity, capacity, and ancillary services, in New York State. The NYISO is also responsible for the reliable operation of the bulk electricity grid, and both short-term and long-term planning for the bulk power system in New York State. The NYISO manages the flow of power over nearly 11,000 circuit-miles of transmission lines and centrally dispatches over 300 generating units. Accordingly, the NYISO has an interest in this proceeding. This interest cannot be adequately represented by any other party. The NYISO, therefore, should be permitted to intervene in this proceeding.

IV. ANSWER

The NYISO also provides this answer in support of Con Edison's May 2, 2012 Motion for a shortened notice period and request for expedited action regarding the Interconnection Agreement. As stated by Con Edison and NYPA in the Interconnection Agreement Filing "the new transmission tie between the Astoria Annex and Astoria East substations [are proposed] as a solution for the reliability deficiencies resulting from the mothballing of the Astoria No. 2 generator and the unavailability of Astoria No. 4."³ The shortened notice period and expedited action by the Commission requested in the Motion should facilitate the completion of the proposed transmission project in advance of the potential occurrence of a local reliability issue. Accordingly, the NYISO supports Con Edison's requests.

³ See Interconnection Agreement Filing at pg. 3.

V. CONCLUSION

WHEREFORE, for the foregoing reasons, the NYISO respectfully requests that the Commission grant this Motion to Intervene and issue an order on the Parties Interconnection Agreement by May 9, 2012.

Respectfully submitted,

/s/ Kristin A. Bluvas

Attorney

New York Independent System Operator, Inc.

May 8, 2012

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Rensselaer, NY this 8th day of May, 2012.

By: /s/ John C. Cutting

John C. Cutting
Senior Regulatory Affairs Specialist
New York Independent System Operator, Inc.
10 Krey Blvd.
Rensselaer, NY 12144
(518) 356-7521